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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 2, 1999

Ms. Helen Bilson
U. S. Department of Energy
P. O. Box 550, MSIN: S7-41
Richland, Washington 99352

Ms. Janice Williams
Fluor Daniel Hanford Incorporated
P. O. Box 1000, MSIN: H6-06
Richland, Washington 99352

Mr. Duane Renberger
Waste Management Hanford Incorporated
P. O. Box 700, MSIN: T3-03
Richland, Washington 99352



Dear Ms. Bilson, Ms. Williams and Mr. Renberger:

Re: Compliance assessment of the T-Plant Complex.

Thank you for the assistance of U. S. Department of Energy (USDOE), Fluor Daniel Hanford Incorporated (FDH), and Waste Management Hanford Incorporated (WMH) personnel during the Washington State Department of Ecology's (Ecology) April 14, 1999, compliance assessment visit at T-Plant. Ecology conducted this assessment during April and May to determine waste management and future use issues in support of facility transitioning negotiations between Ecology, USDOE and its contractors. The following recommendations were derived from this assessment for consideration during future negotiations regarding use and/or disposition of the T-Plant Complex:

RECOMMENDATIONS:

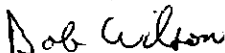
1. Schedules for major decisions concerning the future mission of the 221-T canyon facility should be formalized, preferably by establishing new TPA milestones. An end date should be determined for decisions to place T-Plant as a TPA Section 8 or Section 6 facility. Some future mission plans involving large scale treatment and storage activities of liquid wastes may require major upgrades to the canyon facility. The feasibility of these proposals should be resolved in the near term to avoid excessive investigation efforts.
2. Opportunities to remove all materials from the PWR pool should be aggressively pursued and planned in coordination with canister storage building/K-Basin sludge removal projects to take advantage of early opportunities for removal of this waste.

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3. Review options for near term removal of materials from the canyon deck regardless of future missions for the T-Plant. It appears the 2706-T facility will not have large commitments for decontamination work, which will leave the facility available to support removal of 221-T canyon materials and wastes. This would free the canyon to move more rapidly toward deactivation, or free the facility for new missions, or reduced oversight.
4. All use of the 221-T canyon tank system should end by June 1999, in coordination with the 2706-T facility coming on-line. Use of the 221-T canyon tank system for storage of sample return portions, or storage of any liquid waste, should cease commensurate with the opening of the 2706-T facility.
5. The T-Plant Complex currently includes three areas available for waste container opening and repackaging; the 221-T rail tunnel, the 221-T head-end, and the 2706-T facility. The 2706-T facility contains two (2) enclosed areas and has been upgraded to RCRA standards. It would seem appropriate to consolidate all container opening/segregation activities in this upgraded facility while ending these activities in the 221-T canyon.
6. Areas outside of the 221-T canyon should be explored for proposed macro-encapsulation of debris and long length items.
7. Remote video inspection of the 24" clay header drain system under the 221-T canyon should be performed to determine the integrity of this line, and assess possible leaks.
8. Video surveillance of the 221-T cell indicates liquids in open top tanks existed at the time of the video, as well as considerable quantities of abandoned equipment and debris. A plan to remove liquids in the near term, and equipment as necessary, should be implemented in coordination with transitioning the facility.
9. Information regarding the contents of the 292-T tanks is incomplete, but there is an indication that mixed waste has been stored in them beyond ninety (90) days. All liquids should be removed and these tanks should be scheduled for closure.
10. All underground piping from the 221-T building should be listed and verified to be empty (i.e. not containing liquids). This information should be maintained in the facility's operating record for deactivation and future closure.

If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:ld

cc: James Rasmussen, USDOE
James Buckley, WMH
Steve Szendre, FDH

Mary Lou Blazek, OOE
Administrative Record